

REMARKS

New claims 21-23 are added above. Applicant respectfully requests reconsideration of this application. Applicant thanks the Examiner for the indication of allowable subject matter. As discussed below, Applicant respectfully submits that all claims are allowable.

Applicant respectfully traverses the rejection under 35 U.S.C. §103 based upon the proposed combination of *Popoff* and *Doucet, et al.* There is no *prima facie* case of obviousness.

There is no motivation for making the proposed combination because the substitution suggested by the Examiner would render the arrangement of the primary reference unworkable and, therefore, the combination cannot be made. The Examiner proposes to substitute in the transceiver units of *Doucet, et al.* for the optical transceivers in *Popoff*. The transceiver units in *Doucet et al.* include optical antennas that receive airborne light beams. These are not compatible with the *Popoff* arrangement. The optical transceivers of *Popoff* include LED's and photo detectors to allow the signals transmitted on the optical wave guides of *Popoff* to be used by the electronic interface 24. The optical antennas of *Doucet, et al.* will not work with the fiber optics of *Popoff*. If one were to substitute in airborne light beam technology as taught by *Doucet, et al.*, then the operation of the plurality of wave guides and wave guide couplers used in *Popoff* would be lost. This would defeat the entire operation of *Popoff's* system. Therefore, the combination cannot be made.

Applicant also notes that the *Doucet, et al.* document does not teach using radio frequency signal communication. The paragraphs [0008] and [0046] cited by the Examiner state that the arrangement of *Doucet, et al.* is intended to *avoid* the use of radio frequency communication bands. Instead, the arrangement of that document relies upon light beams transmitted through the air.

Applicant believes that additional fees in the amount of \$200.00 for one additional independent claim and \$150.00 for three claims in excess of twenty are required. A check in the amount of \$350.00 is enclosed. The Commissioner is authorized to charge Deposit Account No. 50-1482 in the name of Carlson, Gaskey & Olds for any additional fees or credit the account for any overpayment.

Respectfully submitted,

CARLSON, GASKEY & OLDS, P.C.




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Dated: September 30, 2005

CERTIFICATE OF MAILING

I hereby certify that the enclosed **Response** is being deposited with the United States Postal Service as First Class Mail, postage prepaid, in an envelope addressed to Commissioner for Patents, P. O. Box 1450, Alexandria, VA 22313-1450 on September 30, 2005.


Theresa M. Palmateer